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7 Hon. Richard A. Jones
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11 UNITED STATES DISTRICT COURT
12 WESTERN DISTRICT OF WASHINGTON AT SEATTLE
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14 JENNIFER and EUGENE WONG, for themselves
15 and as parents of Student JW, a minor,
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No. C16-1774 RAJ

17 Plaintiffs,

18 v.
19 DECLARATION OF ANDREA SCHIERS
20 SEATTLE SCHOOL DISTRICT NO. 1,
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IN SUPPORT OF DEFENDANT'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT

Defendant.

17 Andrea Schiers declares and states as follows:

18 1. **Declarant.** I am a Senior Assistant General Counsel in the General Counsel's
19 Office at Seattle Public Schools (District). I am over the age of 18 and competent to testify to the
20 matters stated in this declaration. I make this declaration based on my own personal knowledge.

21 2. **IEE Due Process Hearing Request.** On or about May 30, 2014, Eugene Wong
22 and Jennifer Wong disagreed with the District's 2012 special education evaluation of the Student
23 and requested that the District fund an Independent Educational Evaluation (IEE) for him. The
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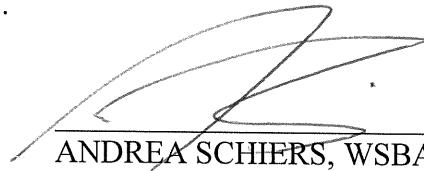
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1 District refused to fund the IEE and, as required by the IDEA, filed a special education due
2 process hearing request on or about June 13, 2014 to defend the appropriateness of its evaluation.

3. **Settlement Conference.** On or about July 11, 2014, the parties met for a
4 settlement conference in an attempt to resolve the IEE dispute that was the subject of the due
5 process hearing request. During the meeting, the Wongs showed the District a copy of Exhibit B
6 of Plaintiff Jennifer Wong's Declaration (Dkt. No. 15), which is a list of alleged damages
7 without specific reference to who incurred them. However, the Wongs refused to let the District
8 keep or make a copy of the list. Furthermore, contrary to the claim in Paragraph 10 of Jennifer
9 Wong's Declaration (Dkt. No. 15), I did not state that I needed to check with the District's
10 insurance company for coverage of the claims.

12 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE
13 OF WASHINGTON THAT THE FOREGOING STATEMENT IS TRUE AND CORRECT.

14 Dated this 28th day of July, 2017.



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16 ANDREA SCHIERS, WSBA # 38383
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